

FILED

UNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICO

JUL 03 2025

MITCHELL R. ELFERS
CLERK

CLASS ACTION COMPLAINT
IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

BRIA, individually and on behalf of a class of similarly situated persons,

Plaintiff,

v.

UNITED STATES GOVERNMENT;

UNITED STATES DEPARTMENT OF HEALTH AND HUMAN SERVICES (HHS),

UNITED STATES DEPARTMENT OF JUSTICE (DOJ),

IMMIGRATION AND CUSTOMS ENFORCEMENT (ICE),

UNITED STATES CONGRESS (as a legislative body),

DONALD J. TRUMP, in his personal and professional capacity,

JOHN and JANE DOES 1-200, inclusive

Defendants.

CASE No: _____

JUDGE: _____

CLASS ACTION COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF AND DAMAGES

INTRODUCTION

1. This is a civil action for declaratory and injunctive relief and damages brought under the Constitution of the United States and relevant federal statutes to challenge ongoing, unlawful actions taken by federal agencies and officials acting beyond the scope of their legal authority, causing significant harm to American citizens.

2. Plaintiff Bria brings this action individually and on behalf of a class of similarly situated individuals who have been impacted by the defendants' violations of civil liberties, misuse of federal funds, violations of due process, healthcare denials, wrongful surveillance, environmental mismanagement, and targeted harassment through federal systems of control and identification.

3. This Complaint also seeks to hold individual actors personally accountable for misusing the Presidential Office, federal funds, and public trust for private gain.

JURISDICTION AND VENUE

4. Jurisdiction is proper under 28 U.S.C. §§ 1331, 1343, 2201, and 2202 as this action arises under the Constitution and laws of the United States.

5. Venue is proper in this district under 28 U.S.C. § 1391(b) because a substantial part of the events or omissions giving rise to the claims occurred within this district, and the defendants either reside in or perform official duties in this jurisdiction.

PARTIES

Plaintiff also includes as Defendants fictitious individuals and entities, designated herein as "John and Jane Does 1–200, inclusive," whose identities, official roles, and full legal responsibilities are presently unknown. Plaintiff alleges, upon information and belief, that these unknown parties are individuals employed by or acting on behalf of federal agencies and institutions named herein, and who have contributed to, facilitated, or overseen actions that directly caused the constitutional, financial, psychological, or medical harms described throughout this Complaint.

Plaintiff reserves the right to amend this Complaint to substitute or supplement these fictitious parties with named defendants as their identities are confirmed through discovery and independent investigation.

6. Plaintiff Bria, is a citizen of the United States, a resident of New Mexico, and a taxpayer harmed by multiple federal agency actions.

7. The Proposed Class includes an estimated 100+ individuals who have been subject to similar harms as described herein.

8. Defendant U.S. Department of Health and Human Services (HHS) is responsible for healthcare programs such as Medicare and Medicaid.

9. Defendant U.S. Department of Justice (DOJ) is responsible for prosecutorial and investigatory federal oversight, including overreaches conducted via federal surveillance and enforcement operations.

10. Defendant Immigration and Customs Enforcement (ICE) is responsible for the detention and deportation of non-citizens but has routinely exceeded legal authority by targeting lawful residents and citizens.

11. Defendant U.S. Congress, in its collective and legislative capacity, has acted in a manner that endangers constitutional rights through passage of recent legislation under conditions of false pretenses and undue influence.

12. Defendant Donald J. Trump, former and potentially sitting U.S. President, is named in both his official and private capacity for actions including misuse of the Presidential Seal and taxpayer funds for private events, obstruction of agency oversight, and abuse of power.

13. Defendants John and Jane Does 1-200, are unknown agents, actors, and officials who knowingly participated in the unlawful policies and enforcement described herein.

FACTUAL ALLEGATIONS

14. On or about July 1, 2025, the U.S. Senate passed a sweeping omnibus bill known informally as the "Big Beautiful Bill," containing provisions that directly alter access to public health programs, environmental protections, and oversight transparency.

15. Cuts to Medicaid and Medicare contained within this bill have already resulted in terminated or delayed care for disabled and low-income individuals.

16. Plaintiff Bria canceled a scheduled ASD (autism spectrum disorder) evaluation for fear that the data provided would be misused by HHS or shared with law enforcement or other agencies.

17. Numerous class members have reported intimidation or wrongful surveillance due to tattoos, religious expression, political affiliation, or neurodivergent diagnoses.

18. ICE quotas have reportedly led to the detention of individuals with no criminal history while violent offenders remain free due to resource misallocation.

19. Public funds have been documented as misused in golf outings, donor dinners involving foreign actors and cryptocurrency schemes, and the use of the Presidential seal at private financial events.

20. Environmental degradation and defunding of alternative energy resources have had a disproportionate effect on rural and Indigenous communities in New Mexico and beyond.

21. The agencies named have consistently evaded accountability by invoking opaque national security justifications and non-transparent legal immunity shields.

CAUSES OF ACTION

COUNT I: VIOLATION OF THE FIRST AMENDMENT

(Prior Restraint, Chilling Effect, Retaliation for Protected Expression)

COUNT II: VIOLATION OF THE FOURTH AMENDMENT

(Unlawful Surveillance and Data Collection)

COUNT III: VIOLATION OF THE FIFTH AND FOURTEENTH AMENDMENTS

(Due Process, Equal Protection, Access to Healthcare)

COUNT IV: MISUSE OF PUBLIC FUNDS & VIOLATION OF ETHICS LAWS

COUNT V: ILLEGAL DETENTION AND HARASSMENT

(ICE Targeting, Abuse of Enforcement Power)

COUNT VI: ENVIRONMENTAL NEGLIGENCE AND ENERGY DISCRIMINATION

PRAYER FOR RELIEF

WHEREFORE, Plaintiff(s) respectfully request that the Court:

- A. Certify this action as a class action;
- B. Declare the conduct of Defendants unlawful;
- C. Enter an injunction against enforcement or continuation of such programs;
- D. Order compensatory and punitive damages for named Plaintiff and class;
- E. Award attorneys' fees and costs;
- F. Grant such other relief as the Court deems just and proper.

Respectfully submitted,


Bria

Plaintiff (Pro Se)

thepeoplesbrief@protonmail.com

Dated: July 3, 2025

Bria Kaye
Albuquerque, NM
Thepeoplesbrief@protonmail.com

Date: July 3, 2025

Clerk of Court
U.S. District Court for the District of New Mexico
333 Lomas Blvd NW
Albuquerque, NM 87102

Re: Filing of Class Action Complaint – Bria Kaye v. United States Government, et al.

To Whom It May Concern,

Please find enclosed for filing:

1. One original and two copies of the Class Action Complaint
2. Civil Cover Sheet (JS 44)
3. Summons forms (AO 440)
4. Application to Proceed In Forma Pauperis

I am filing this action pro se as a citizen and class representative. Please return a filed copy in the enclosed self-addressed envelope. I can be reached at thepeoplesbrief@protonmail.com should you require any further information.

Sincerely,
Bria Kaye (Pro Se Plaintiff)